



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1868

OCT 26 2010

Ms. Mary Lou Capichioni
Director
Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: Sherwin-Williams/Hilliards Creek Site - Kirkwood Lake
Voorhees Township and Lindenwold Borough, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035
Kirkwood Lake Investigation Report (dated April 30, 2009) – Response
to USEPA Comments and Work Plan Request

Dear Ms. Capichioni:

The United States Environmental Protection Agency (EPA) and New Jersey Department of Environmental Protection (NJDEP) have reviewed the Response to USEPA Comments: *Kirkwood Lake Investigation Report – Evaluation of Sampling Results* (April 30, 2009) and completion of a Work Plan request for additional Kirkwood Lake sediment and soil sampling and residential property soil sampling. EPA and NJDEP offer the following based on the review of the above.

General Comments

1. EPA and NJDEP disagree with the statement made on Page 3, which states: "At depth, the coarse-grained material beneath Kirkwood Lake is soil, not sediment, since there is no potential for benthic exposure." While a specific depth is not provided here, one is later provided on Page 18 of the Work Plan, where it is proposed that (sediment) samples collected from a depth greater than six feet will be compared to the NJDEP Residential Direct Contact Soil Remediation Standard (RDCSRS). At the time of field sampling the physical characteristics (grain size, percent solids, and organic carbon content) will not be known. As noted by Sherwin-Williams in the submittal, even after sampling and data is compiled, "professional judgment", "review of photographs", and "field observations" had to be employed to determine the characteristics of the sediment. All of this is further complicated by the fact that an additional zone (the transition zone) has been proposed to the two existing sediment classification types (i.e., soft, organic-rich sediment [silt] and coarse-

grained "material" [consolidated coarser-grained sand]).

However, for the purposes of driving this sampling program forward, comparing the XRF screening results (for sediments deeper than 6.0 ft) to the NJDEP RDCSRS is permitted. If additional data is required at a later time to perform a Risk Assessment, it should be noted that additional samples may be required.

2. EPA is not requesting that an evaluation of results and proposal to complete soil and sediment delineation (report – similar to those for the Route 561 Dump, Vacant Lot, and United States Avenue Burn sites) for the Hilliard's Creek portion of the Sherwin-Williams/Hilliard's Creek Site be created and submitted to EPA at this time. Instead, after the submittal of the reports for the Railroad area and Bridgewood Lake are submitted, EPA is requesting that a proposal for any additional sampling (required) at the Former Manufacturing Plant (FMP) area be submitted. The proposal should also present a summary of the data collected from the 2009 Supplemental Work Plan. EPA is requesting that this FMP data summary and sampling proposal be submitted to EPA in 60 days.

Specific Comments

1. It is permissible to reduce the analyte list, associated with the request to conduct residential sampling of the homes along Kirkwood Lake, to TAL Metals and cyanide only.
2. The current residential soil sampling proposal includes the fact that the 2.0 – 2.5 ft. intervals will be field screened with the XRF. It should be noted that all other residential sampling (Hilliards Creek and elsewhere) established that in addition to the 0.0 – 0.5 ft. interval (which has been proposed for the Kirkwood Lake homes), the 1.5 – 2.0 ft. interval was to be sampled and this depth should be employed here as well. In addition, it is not necessary to perform XRF screening on the deeper samples.
3. EPA and NJDEP maintain the prior request to install a monitoring well across the first water table at a location between White Horse Road and samples KWSB0014 and KWSB0015.
4. On Page 18, it is stated that sediment samples will be analyzed for TAL Metals (plus cyanide), percent solids, and total organic carbon. However, as previously requested in EPA's March 11, 2010 comment letter, EPA maintains that grain size and pH also be analyzed and reported. Incidentally, these were also the same parameters which were collected during the October/November 2007 sampling effort.

Please submit a draft Work Plan for the activities outlined in Attachment 1 within 30 days of receipt of this comment letter. If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Carole Petersen", with a stylized flourish at the end.

Carole Petersen, Chief
New Jersey Remediation Branch

cc: Lynn Vogel, NJDEP